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18 UNITED STATES DISTRICT COURT  
19 CENTRAL DISTRICT OF CALIFORNIA  
20 SOUTHERN DIVISION

21 WANDA SMITH, individually and on  
22 behalf of all others similarly situated,

23 Plaintiff,

24 v.

25 EXPERIAN INFORMATION  
26 SOLUTIONS, INC,

27 Defendant.

Case No. 17-cv-00629-CJC-AFM

Hon. Cormac J. Carney

**NOTICE OF MOTION AND  
PLAINTIFF'S UNOPPOSED  
MOTION TO LIFT STAY, DIRECT  
CLASS NOTICE, AND GRANT  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Hearing: August 24, 2020

Time: 1:30 p.m.

Courtroom: 9B

1       **PLEASE TAKE NOTICE** that on Monday, August 24, 2020, at 1:30 p.m., or as  
 2 soon thereafter as the parties may be heard, before the Honorable Cormac J. Carney,  
 3 Plaintiff Wanda Smith (“Plaintiff”) will, and hereby does, move the Court for entry of an  
 4 order granting Plaintiff’s unopposed motion to lift stay, direct class notice, and grant  
 5 preliminary approval of this class action settlement, concluding that it will likely be able  
 6 to approve the proposed Settlement as fair, reasonable, and adequate pursuant to Federal  
 7 Rule of Civil Procedure 23(e) and that the prerequisites of Rules 23(a) and (b)(3) have  
 8 been met; approving the proposed class notice submitted as Exhibit 1 to the Settlement  
 9 Agreement and authorizing the dissemination of Notice to the Class; appointing Wanda  
 10 Smith as the Class Representative and Norman E. Siegel and J. Austin Moore of Stueve  
 11 Siegel Hanson LLP as interim class counsel pursuant to Rule 23(g)(3); appointing  
 12 Angeion Group as the Settlement Administrator with responsibility for administering the  
 13 settlement fund and disseminating notice in accordance with the Agreement; and setting  
 14 settlement deadlines and scheduling a final approval hearing.

15       Plaintiff respectfully seeks to proceed with the preliminary approval hearing  
 16 telephonically or by videoconference pursuant to Central District of California General  
 17 Order No. 20-05, *In re Coronavirus Public Emergency Further Order Concerning Jury*  
 18 *Trials and Other Proceedings*, which provides in pertinent part that “hearings in civil  
 19 cases will only go forward by video or telephonic conference.”<sup>1</sup>

20       This motion is based on this notice of motion and motion, the memorandum and  
 21 all exhibits and attachments thereto, and upon such other and further oral or documentary  
 22 evidence as may be presented to the Court. Plaintiff has conferred with Defendant’s  
 23 counsel and Defendant has represented it does not oppose this motion.

24  
25  
26  
27       <sup>1</sup> Available at: [https://www.cacd.uscourts.gov/sites/default/files/general-](https://www.cacd.uscourts.gov/sites/default/files/general-orders/GO%2020-05_0.pdf)  
 28 [orders/GO%2020-05\\_0.pdf](https://www.cacd.uscourts.gov/sites/default/files/general-orders/GO%2020-05_0.pdf).

1 Dated: July 20, 2020

By: /s/ Norman E. Siegel

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25 **CERTIFICATE OF SERVICE**

26 I hereby certify that on July 20, 2020, I caused to be filed the foregoing document.  
27 This document is being filed electronically using the Court's electronic case filing (ECF)  
28 system, which will automatically send a notice of electronic filing to the email addresses  
of all counsel of record.

Dated: July 20, 2020

/s/ Norman E. Siegel  
Norman E. Siegel